

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)

Investigation by the Department of Telecommunications and Energy on )

its own motion pursuant to G.L. c. 159, §§ 12 and 16, into Verizon ) D.T.E. 01-34

New England Inc., d/b/a Verizon Massachusetts' provision of )

Special Access Services. )

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PETITION TO INTERVENE OF WORLDCOM, INC.

Pursuant to 220 C.M.R. §1.03(1), WorldCom, Inc. ("WorldCom"), on behalf of itself and its affiliated entities that provide telecommunications services in Massachusetts, hereby petitions the Department of Telecommunications and Energy (the "Department") for leave to intervene as a party in this proceeding. WorldCom's principal offices are located at 500 Clinton Center Drive, Clinton, Mississippi 39056. As grounds for its Petition, WorldCom states as follows:

Though various operating subsidiaries, WorldCom is authorized to offer domestic interstate, intrastate, local and international telecommunications services in each of the fifty states and the District of Columbia, and is a common carrier of telecommunications services authorized by the Department to provide interLATA and intraLATA services in Massachusetts. WorldCom competes with Verizon New England, Inc., d/b/a Verizon Massachusetts ("Verizon") in the provision of certain intraLATA telecommunications services in Massachusetts and will, if Verizon is granted authority to provide in-region interLATA services in Massachusetts, compete with Verizon in the provision of these services as well. WorldCom purchases substantial volumes of special access and other services from Verizon. WorldCom and its customers have been adversely affected by Verizon's chronic problems in provisioning, maintaining and repairing special access circuits.

As both a customer and competitor of Verizon, WorldCom has an interest in receiving just, reasonable and nondiscriminatory treatment from Verizon with respect to the special access services WorldCom purchases; WorldCom seeks to protect that interest by participating herein.

For the foregoing reasons, WorldCom will be substantially and specifically affected by the Department's review and decision in this docket.

WorldCom intends to fully participate in the proceedings in this docket and may, as necessary, conduct discovery, present witnesses, cross-examine witnesses, present

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legal arguments, file briefs, etc. to protect its interests. WHEREFORE, WorldCom respectfully requests leave to intervene in this proceeding.  
Respectfully submitted,

WORLDCOM, INC.

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Dated: New York, New York  
March 27, 2001  
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APPEARANCE OF COUNSEL

In the above-captioned proceeding, the undersigned hereby appears for and on behalf of WorldCom, Inc. and its affiliated entities that provide telecommunications services in Massachusetts.

Respectfully submitted,

WORLDCOM, INC.

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Christopher J. McDonald  
WorldCom, Inc.  
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New York, NY 10166  
(212) 519 4164  
Fax (212) 519 4569  
Christopher.McDonald@wcom.com

Dated: New York, New York  
March 27, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by either U.S. mail or overnight courier.

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Dated: New York, New York

March 27, 2001

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